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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

INDEX NEWSPAPERS LLC, a Washington limited-liability company, dba **PORTLAND MERCURY**; **DOUG BROWN**; **BRIAN CONLEY**; **SAM GEHRKE**; **MATHIEU LEWIS-ROLLAND**; **KAT MAHONEY**; **SERGIO OLMOS**; **JOHN RUDOFF**; **ALEX MILAN TRACY**; **TUCK WOODSTOCK**; **JUSTIN YAU**; and those similarly situated,

Plaintiffs,

v.

CITY OF PORTLAND, a municipal corporation; **JOHN DOES 1-60**, officers of Portland Police Bureau and other agencies working in concert; **U.S. DEPARTMENT OF HOMELAND SECURITY**; and **U.S. MARSHALS SERVICE**,

Defendants.

Case No. 3:20-cv-1035-SI

**DECLARATION OF SARAH JEONG
REGARDING EVENTS OF JULY 21, 2020**

I, Sarah Jeong, declare:

1. I am an Oregon resident who lives in the City of Portland. I am a contributing writer for the *New York Times* Opinion section and a columnist for *The Verge*, and I am reporting on the protests in Portland for the magazine the *New Republic*. If called as a witness, I could and would testify competently to the facts below.

2. I have been a journalist for 6 years. My work has appeared in the *New York Times*, the *Verge*, the *Atlantic*, the *Washington Post*, *New York Times Magazine*, *Motherboard*, *Forbes*, the *Guardian*, and many other publications. In 2016, I was a Poynter Fellow in Journalism at Yale University. I was previously on the Editorial Board of the *New York Times*.

3. I am also a lawyer: I graduated from Harvard Law School in 2014, where I served as an editor on the *Harvard Journal of Law & Gender*. I am a member of the California State Bar; my bar number is 309363.

4. When I attend the protests, I attend solely in my role as a journalist. I do not break any laws, I do not engage in any violence, and I do not intercede when I see police or federal agents intimidate, attack, or arrest members of the public. I wear a press badge with my name on it that says "PRESS" in big bold letters. Like many reporters, I made my press badge myself. Its purpose is to identify me as a member of the press to law-enforcement officers. I also wear a helmet with the word "PRESS" on it in black on a white background on three sides, and I often mark my backpack in a similar manner. I do so because I have read the temporary restraining orders the Court has entered, and as I understand them, such markings are more than sufficient indicia for the police (and now federal agents) to identify me as a member of the press.

5. On the night of July 21, 2020, I was covering the protests in front of the federal courthouse in downtown Portland. I was on the steps of the courthouse, under the overhang, when federal agents exited from the south side of the building and charged the crowd from the side.

6. My general practice in these situations is to walk backwards slowly, holding my press pass up in one hand and my phone in the other, continuing to document the events taking

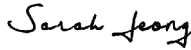
place. I walk slowly to avoid tripping and I do not turn and run, as that can startle both law enforcement and protesters. I followed this general practice on this occasion.

7. With no warning, and for no reason, a federal agent shoved me so hard that I went flying. Both my feet left the ground. I landed on my back and left side. Fortunately, my backpack broke most of the fall, but my left arm is scraped in several places, my tailbone is bruised, and my neck is painfully stiff with a decreased range of motion. The protesters had formed a line of shields to protect themselves, but one protester left the line to help me to my feet.

8. I continued reporting that night, but my hands and body were shaking, and I ultimately left much earlier than I had planned. I intend to continue covering the protests, but I am fearful for my safety.

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Dated: July 28, 2020

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Sarah Jeong